## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING

RIA R SQUARED, INC.,	)
a Delaware corporation,	)
Plaintiff,	)
v.	) Case No. 21-CV-125
PAUL D. MCCOWN, AND MCCOWN ENTERPRISES, LLC, a Wyoming Limited Liability Company	) ) ) )
Defendants.	)

## STIPULATED MOTION FOR ENTRY OF JUDGMENT

The parties, by and through their respective counsel, hereby advise the Court a stipulated judgment agreement, regarding the breach of contract, piercing the corporate veil and fraud claims, has been entered into by and between the parties.

The stipulated judgment provides that Defendants (i) are liable for the entire claimed amount of \$15 million, plus accruing pre-judgment interest at the rate of 5.5% per annum; (ii) provides Defendants with appropriate credit for monies received by Plaintiff (through this matter and other related matters) as of the filing of this pleading and (iii) results in a principal amount due and owing of \$2,263,825.84, to accrue post-judgment interest at the rate of 5.5% per annum.

Consequently, the parties respectfully request the Court enter the stipulated judgment, as attached hereto, and incorporated herein by reference, as **Exhibit A**.

Upon the entering of the stipulated judgment, Plaintiff shall then file a notice of dismissal, resolving all remaining items and/or claims before the Court. Once that pleading is completed, all

hearings, deadlines and trials in this matter may be vacated.

WHEREFORE, the parties respectfully request the Court accept and enter this presented stipulated judgment and authorize the parties to proceed accordingly to finalize the litigation of this matter.

Respectfully submitted this 10th day of March, 2023.

## RIA R SQUARED, INC., a Delaware corporation,

Plaintiff.

By: /s/: Ryan L. Ford
Stuart R. Day, WSB# 5-2244, sday@wpdn.net
Ryan J. Schwartz, WSB# 6-3611, rschwartz@wpdn.net
Ryan L. Ford, WSB# 7-4667, rford@wpdn.net
WILLIAMS, PORTER, DAY & NEVILLE, P.C.
PO Box 10700
Casper, WY 82602
(307) 265-0700
(307) 266-2306 (facsimile)

Joshua S. Bauchner, jb@ansellgrimm.com Layne A. Feldman, laf@ansellgrimm.com ANSELL GRIMM & AARON, PC 365 Rifle Camp Road Woodland Park, New Jersey 07424 (973) 247-9000 (973) 247-9199 (facsimile) Pro-hac vice

Attorneys for Plaintiff

PAUL D. MCCOWN, AND MCCOWN ENTERPRISES, LLC, a Wyoming Limited Liability Company,

Defendants.

By: /s/: Jason M. Tangeman
Jason M. Tangeman, WSB # 6-3082
Nicholas & Tangeman, LLC

170 North Fifth St. P.O. Box 0928 Laramie, WY 82073-0928 (307) 742-7140 jtangeman@wyolegal.com

Attorneys for Defendants